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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO HOMELESS UNION, a
local of the CALIFORNIA HOMELESS
UNION/STATEWIDE ORGANIZING
COUNCIL, on behalf of itself and those it
represents; BETTY RIOS; DONTA
WILLIAMS; FALISHA SCOTT and all those
similarly situated,

Plaintiffs,

vs.

COUNTY OF SACRAMENTO, a political
subdivision of the State of California; CITY
OF SACRAMENTO, a municipal
corporation; and DOES 1 – 100,

Defendants.

Case No.: 2:22-cv-01095-TLN-KJN

**DECLARATION OF CAPTAIN
BRYCE HEINLEIN IN SUPPORT OF
DEFENDANT CITY OF
SACRAMENTO'S OPPOSITION TO
PLAINTIFFS' EX PARTE MOTION
FOR TEMPORARY RESTRAINING
ORDER AND RE-INSTATEMENT
OF PRIOR PRELIMINARY
INJUNCTION OR FOR NEW
PRELIMINARY INJUNCTION**

Judge: Hon. Troy L. Nunley

I, BRYCE HEINLEIN, declare:

1. I have personal knowledge of the facts stated herein and, if called to testify, I can competently testify thereto.

2. I am currently employed by the Sacramento Police Department ("SPD") as a Police Captain and have been employed in a sworn capacity with SPD for almost 24 years. Over the past 16 months, I have been assigned to the Metro Division which oversees the Impact Unit. This unit consists of six (6) police officers and one (1) police sergeant who predominately focus

1 on taking a holistic approach to help address the homeless crisis in the city of Sacramento. The
2 unit was created in 2015 and uses Community Oriented Policing and Problem-Solving
3 strategies to mitigate the impacts of the homelessness on the community.

4 3. The SPD Impact Unit works in conjunction other City departments responding to
5 homeless related concerns from the community regarding blight, excessive property, or
6 violation of criminal laws and/or City code violations. Impact works alongside the Department
7 of Community Response ("DCR") to provide outreach to people experiencing homelessness
8 ("PEH") for services to include drug treatment, mental health services and
9 temporary/permanent alternative housing. They also respond to complaints of illegal activity
10 in and around camps and conduct Crime Prevention Through Environmental Design
11 ("CPTED") assessments for homeless-related issues.

12 4. The Impact Unit's objectives in relocating PEH is to gain voluntary compliance in
13 coordination with DCR when they are in violation of the City of Sacramento's Critical
14 Infrastructure Ordinance. (S.C.C. 8.140.030) In addition, the Impact Unit assists other City
15 departments in large scale clean-ups where maintenance of critical infrastructure is required
16 and/or there is significant public risk.

17 5. Some examples where PEH were relocated are when sidewalks are blocked, they
18 are camping 500' of a K-12 school, they are blocking the right-away for first responders,
19 government buildings and critical infrastructure, such as fire stations, police stations, jails,
20 courthouses, hospitals, antennas, bridges, roads, train tracks, drainage systems, levees, public
21 utilities, electrical wires, natural gas pipes, telecommunication centers and water sources.

22 6. So far in 2023, the SPD Impact Team has been able to gain compliance with all
23 PEH that are in violation of Critical Infrastructure Ordinance or the Sidewalk Ordinance and
24 have not had to take any enforcement action. If an individual must be moved involuntarily,
25 the SPD will assist PEH with physically moving their property to a location that is not in
26 violation of the ordinances. If a PEH is arrested for an unrelated charge, the SPD Impact Team
27 will store their "life necessities" for safekeeping at the SPD Property Division until they can
28 retrieve them or their neighbor will take temporary ownership of their property until they are

1 released from custody. This will only occur at the property owner's discretion. Attached hereto
2 as Exhibit A are true and correct copies of the City's Critical Infrastructure Ordinance,
3 Sacramento City Code Chapter 8.140 and Sidewalk Obstructions and Pedestrian Interference
4 Ordinance Chapter 12.24.

5 7. As stated, the primary goal of the Impact Unit is to obtain voluntary compliance for
6 people to relocate. From January 1, 2023, to May 31, 2023, the Impact Unit responded to 610
7 calls for service from the community. Of those calls and during the same period, there were
8 thirty (30) arrests for a variety of offenses to include, outstanding arrest warrants, narcotics,
9 theft and resisting arrest. In addition, the Impact Team also coordinated with a private
10 contractor who assisted in 434 different cases, collected over 6,634 yards of debris, and disposed
11 of 6,972 hypodermic needles.

12 8. Having personally spent many hours working in field and administration positions
13 within the department, I have become very knowledgeable about the issues that have resulted
14 from the homeless population in Sacramento.

15 9. For example, in February of 2023, (SPD 23-84787) the City conducted a joint
16 operation involving several City departments to clear City owned property leased to the Haggin
17 Oaks Golf Complex. This property received numerous community complaints regarding PEH
18 trespassing and living on the property in makeshift shelters. This area became overrun with
19 garbage, hazardous material, human waste, hypodermic needles, stolen vehicles, making it
20 unsafe and unusable to the public. There were also documented assaults and a homicide in the
21 nearby area involving PEH. During this month-long operation which ended on March 31, 2023,
22 18 PEH were contacted by Impact, 24 abandoned/stolen vehicles were recovered, 215,060 lbs.
23 of trash was removed, 20,000 lbs. of metal and propane tanks were removed, and 2,143
24 hypodermic needles were disposed of. Attached hereto as Exhibit B, is a true and correct copy
25 of my After Action Report of the Haggin Oaks Golf Complex.

26 10. In June 2023, (SPD 23-167286) City departments conducted another joint City
27 operation focused on the Roseville Rd area, north of Connie Rd. This location received
28 numerous community complaints of PEH living in makeshift living quarters and inoperable

1 vehicles parked dangerously close to the fog line causing a significant public hazard to passing
2 vehicles. Unfortunately, there were several fatal vehicle vs. pedestrian accidents in the
3 immediate area due to these dangerous conditions involving PEH. In addition, excessive
4 garbage, debris, stolen vehicles, burned up and inoperable vehicles were strewn throughout the
5 area. During this three-day operation, 18 PEH were contacted by Impact, 30 vehicles removed,
6 318,260 lbs of trash removed, and 257 hypodermic needles were disposed of that were found
7 strewn around the area. Attached hereto as Exhibit C, is a true and correct copy of the After
8 Action Report prepared by Sgt. Andrew Pettit with the Impact Team.

9 11. From July 12 – 21, 2023, City departments conducted a joint outreach operation to
10 seek camp compliance and to offer safe alternative shelter to approximately 38 encampments
11 and 31 people located at 28th and C Streets in Sacramento. This particular location was heavily
12 inhabited by both tent encampments and out of compliance vehicles and since early 2023, had
13 been the source of countless calls from the community complaining of criminal activity
14 including narcotic activity, prostitution, theft and vandalism. During this operation, 12,400
15 pounds of trash and debris and 813 syringes were disposed of. Attached hereto as Exhibit D,
16 is a true and correct copy of the After Action Report prepared by Sgt. Andrew Pettit and Officer
17 McVane with the SPD Impact Team.

18 12. The Haggin Oaks, Roseville Road, and 2800 C Street operations were designated
19 High Priority, Level 1 encampment locations, which according to the Citywide Homelessness
20 Response Protocols, mean: (a) an encampment adjacent or blocking access to, an essential
21 location, or (b) an encampment where there is a public health and safety risk that necessitates
22 urgent relocation of the unhoused.

23 13. Another example of the safety concerns expressed by community members was in
24 May 2023. The SPD Impact team received numerous complaints from businesses and residents
25 in the area of 14th Street and Broadway regarding PEH involved in loitering, drug use, drug
26 dealing, prostitution, human waste, hypodermic needs and drug paraphernalia. Business and
27 property owners in the area to this day are still experiencing harassment and threats by PEH.
28 The businesses assembled a site plan to place boulders along the landscape strip with the goal

1 of making the streets and sidewalks safe and accessible for the families and property owners to
2 protect their employees and customers. This Crime Prevention Through Environmental
3 Design (CPTED) application was approved City of Sacramento and has helped alleviate some
4 of the safety concerns of residents and business owners.

5 14. An Order preventing the City from addressing the issues posed by encampments,
6 such as those described above, would increase threats to the public health and safety of everyone
7 within the City.

8 I declare under penalty of perjury according to the laws of the State of California that the
9 foregoing is true and correct.

10 Executed on August 2, 2023 in Sacramento, California.

11
12 
Captain Bryce Heinlein (Aug 2, 2023 14:49 PDT)

13 **BRYCE HEINLEIN**
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EXHIBIT A

Sacramento, California City Code

Title 8 HEALTH AND SAFETY

Chapter 8.140 PROTECTION OF CRITICAL INFRASTRUCTURE AND WILDFIRE RISK AREAS

8.140.010 Findings and purpose.

8.140.020 Definitions.

8.140.030 Prohibited activities.

8.140.040 Summary abatement.

8.140.050 Interference with summary abatement.

8.140.060 Violation—Penalty.

8.140.010 Findings and purpose.

The City Council finds as follows: (1) a principal threat to the public health, safety, and welfare is the potential destruction of, damage to, or interference with, infrastructure that is critical to the provision of public services such as law enforcement, fire prevention, transportation, and utilities including communication, water, and waste disposal; (2) destruction of, damage to, or interference with, critical infrastructure is caused by fire, contamination, restricting access, or other causes; and (3) destruction of, damage to, or interference with, critical infrastructure is often caused by persons whose activities are not permitted or authorized in, on, or near critical infrastructure.

The purpose of this chapter to mitigate the threat of fire and other potential causes of destruction and damage to and interference with, critical infrastructure, in order to protect the health, safety, and welfare of the public, by authorizing the removal of persons and their personal property in, on, or near critical infrastructure. (Ord. 2020-0009 § 1)

8.140.020 Definitions.

When used in this chapter, the following words and phrases have the following meanings:

“Camp” has the same meaning as in section 12.52.020.

“Camp facilities” has the same meaning as in section 12.52.020.

“Camp paraphernalia” has the same meaning as in section 12.52.020.

"Critical infrastructure" means each of the following:

1. Levees; or
2. Real property or a facility, whether privately or publicly owned, as approved by resolution of the city council, that the city manager designates as being so vital and integral to the operation or functioning of the city that its damage, incapacity, disruption, or destruction would have a debilitating impact on the public health, safety, or welfare.

Critical infrastructure may include, but is not limited to, government buildings, such as fire stations, police stations, jails, or courthouses; hospitals; structures, such as antennas, bridges, roads, train tracks, drainage systems, or levees; or systems, such as computer networks, public utilities, electrical wires, natural gas pipes, telecommunication centers, or water sources.

"Debris" has the same meaning as in section [13.10.010](#).

"Facility" means a building, structure, equipment, system, or asset.

"Fire prevention official" means the fire chief, a deputy fire chief, the fire marshal, or a fire prevention officer.

"Garbage" has the same meaning as in section [13.10.010](#).

"Hazardous waste" has the same meaning as in California [Public Resources Code](#) section 40141.

"Hollow sidewalk" means a sidewalk that has been determined to be a hollow sidewalk in "Raised Streets & Hollow Sidewalks" survey report of July 20, 2009, prepared by Page & Turnbull, Inc. for the City of Sacramento.

"Infectious waste" has the same meaning as in [California Code of Regulations](#), title 14, section 17225.36.

"Solid waste" has the same meaning as in section [13.10.010](#).

"Wildfire risk area" has the same meaning as in [California Code of Regulations](#), title 24, part 9, section 202. (Ord. 2020-0009 § 1)

8.140.030 Prohibited activities.

A. It is unlawful and a public nuisance for any person to camp, occupy camp facilities, or use camp paraphernalia at the following locations:

1. Critical infrastructure;
2. Within 25 feet of critical infrastructure;
3. Within 25 feet of a vehicular or pedestrian entrance or exit of critical infrastructure;

4. On those portions of a right-of-way that are required by local, state, or federal law to be free of obstruction to first responders, including but not limited to members of law-enforcement, fire-prevention, or emergency-medical-services agencies;

5. Within a hollow sidewalk; or

6. Wildfire risk area.

B. It is unlawful and a public nuisance for any person to store personal property, including camp facilities and camp paraphernalia, in the following locations without the written consent of the owner, except as otherwise provided by resolution of the city council:

1. Critical infrastructure;

2. Within 25 feet of critical infrastructure;

3. Within 25 feet of a vehicular or pedestrian entrance or exit of critical infrastructure;

4. On those portions of a right-of-way that are required by local, state, or federal law to be free of obstruction to first responders, including but not limited to members of law-enforcement, fire-prevention, or emergency-medical-services agencies;

5. Within a hollow sidewalk; or

6. Wildfire risk area.

C. It is not intended by this section to prohibit overnight camping on private residential property by friends or family of the property owner, so long as the owner consents and the overnight camping is limited to not more than one consecutive night.

D. Nothing in this chapter is intended to prohibit or make unlawful the activities of an owner of private property or other lawful user of private property that are normally associated with and incidental to the lawful and authorized use of private property for residential or other purposes; and nothing is intended to prohibit or make unlawful the activities of a property owner or other lawful user if such activities are expressly authorized by the Planning and Development Code or other laws, ordinances, and regulations. (Ord. 2020-0009 § 1)

8.140.040 Summary abatement.

A. Any violation of section 8.140.030 may be abated by the city upon 24 hours of prior notice; but a violation of section 8.140.030 may be abated immediately by the city without prior notice, if the violation poses an imminent threat to public health or safety.

B. Abatement pursuant to subsection A may include, but is not limited to, removal of camp facilities, camp paraphernalia, personal property, garbage, hazardous waste, infectious waste, junk, or debris; and securing the perimeter of the property with fencing, gates, or barricades to prevent further occurrences of the nuisance activity.

C. Regardless of the city's authority to conduct abatement pursuant to this section, every owner, occupant, or lessee of real property, and every holder of any interest in real property, is required to maintain the property in compliance with local, state, and federal law; and is liable for violations thereof.

D. The cost of abatement, including all administrative costs of any action taken hereunder, may be assessed against the subject premises as a lien, made a personal obligation of the owner, or both, in accordance with procedures in article VIII of chapter 8.04. (Ord. 2020-0009 § 1)

8.140.050 Interference with summary abatement.

No person shall willfully prevent, delay, resist, obstruct, or otherwise interfere with a city official, employee, contractor, or volunteer in their execution of an abatement pursuant to this chapter. (Ord. 2020-0009 § 1)

8.140.060 Violation—Penalty.

A. In addition to any other remedy allowed by law, any person who violates a provision of this chapter is subject to criminal sanctions, civil actions, and administrative penalties pursuant to chapter 1.28.

B. Violations of this chapter are hereby declared to be a public nuisance.

C. Any person who violates a provision of this chapter is liable for civil penalties of not less than \$250 or more than \$25,000 for each day the violation continues.

D. All remedies prescribed under this chapter are cumulative and the election of one or more remedies does not bar the city from the pursuit of any other remedy to enforce this chapter. (Ord. 2020-0009 § 1)

Contact:

City Clerk: 916-808-7200

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Sacramento, California City Code

Title 12 STREETS, SIDEWALKS AND PUBLIC PLACES

Chapter 12.24 SIDEWALK OBSTRUCTIONS AND PEDESTRIAN INTERFERENCE

Note

12.24.010 Definitions.

12.24.020 Sidewalk obstructions.

12.24.030 Sidewalk benches—Permitted.

12.24.040 Sidewalk benches—Construction, maintenance, etc.

12.24.050 Sidewalk benches—Liability of city.

12.24.060 Temporary structures.

12.24.070 Violation—Penalty.

Note

* Prior history: prior code §§ 38.06.061—38.06.070-1.

12.24.010 Definitions.

“City manager” means the city manager or designee.

“Director” means the director of public works or designee.

“Sidewalk” means the portion of the public right-of-way – including any landscaped areas – between a building or other property and the roadway, set apart for pedestrian travel by curbs, barriers, markings, or other delineation. (Ord. 2022-0023 § 2)

12.24.020 Sidewalk obstructions.

A. No person shall obstruct, or cause to be or obstructed, any sidewalk by erecting, placing or maintaining signs, posts, structures or other obstructions of any kind except as otherwise provided in this code. The city manager may remove such obstructions 8 hours after notice to the owner or person in charge of the obstructions. If the owner or person in charge of the obstruction cannot be readily located for the purpose of providing notice, the city manager may remove the obstruction to a suitable location and store the obstruction at the expense of the owner or person in charge of the obstruction.

The city manager may enforce this subsection without notice in the event of an immediate threat to the public health, safety, or welfare.

B. No person, after first being ordered to move by the city manager and being offered a location to place or store the person's possession that is not in violation of the provisions of this code, shall obstruct a sidewalk in a manner that:

1. Leaves less than four feet of width for the accommodation of pedestrians or vehicles;
2. Blocks the lawful passage of a vehicle; or
3. Requires another person or a driver of a vehicle to take evasive action to avoid physical contact.

The city manager may enforce this subsection without first issuing an order to move and offering a location to place or store the person's possession, in the event of an immediate threat to the public health, safety, or welfare.

C. No person shall conduct or manage any place of business in a manner that hinders or obstructs the free passage of pedestrians along a sidewalk, or that blocks the entrance or prevents free ingress and egress into or from any other place of business.

D. No person, after first being ordered to move by the city manager and being offered a location to stand, sit, lie, or place an object that is not in violation of the provisions of this code, shall stand, sit, lie, or place an object on any portion of a sidewalk within four feet of the entrance to a building in a manner that blocks the entrance or prevents free ingress or egress into or from the building. However, the city manager may enforce this subsection without first issuing an order to move and offering an alternative location to stand, sit, lie, or place an object, in the event of an immediate threat to the public health, safety, or welfare.

E. Nothing in this section prevents merchants or persons who receive or deliver goods for a merchant from using the sidewalk in front of the merchant's premises for that purpose. (Ord. 2022-0023 § 2)

12.24.030 Sidewalk benches—Permitted.

The director may, on proper written application, grant a revocable permit for the erection and maintenance of certain benches for the use of the public, to be placed on public sidewalks at places that the director designates within the city, in a manner that does not interfere in any way with the use of the sidewalk by pedestrians. (Ord. 2022-0023 § 2)

12.24.040 Sidewalk benches—Construction, maintenance, etc.

Sidewalk benches shall be erected and maintained in a manner that conforms with the specifications required by the director, and shall be constructed and erected under the supervision of the director. (Ord. 2022-0023 § 2)

12.24.050 Sidewalk benches—Liability of city.

The granting of the permit to maintain sidewalk benches shall be conditioned on the execution by the holder of the permit of a contract to save the city harmless from any liability which might arise by reason of the erection and maintenance of such benches. (Ord. 2022-0023 § 2)

12.24.060 Temporary structures.

The director may, on proper written application, grant a temporary permit for the erection of temporary structures or signs during public celebrations; provided, that the structures or signs do not in any way interfere with the use of the sidewalk by pedestrians and that the structures or signs are immediately removed when they are no longer necessary. (Ord. 2022-0023 § 2)

12.24.070 Violation—Penalty.

A. In addition to any other remedy allowed by law, any person who violates a provision of this chapter is subject to criminal sanctions, civil actions, and administrative penalties pursuant to chapter 1.28.

B. Violations of this chapter are hereby declared to be a public nuisance.

C. Any person who violates a provision of this chapter is liable for civil penalties of not less than \$250 or more than \$25,000 for each day the violation continues.

D. Any person who violates a provision of this chapter is guilty of a misdemeanor.

E. All remedies prescribed under this chapter are cumulative and the election of one or more remedies does not bar the city from the pursuit of any other remedy to enforce this chapter. (Ord. 2022-0023 § 2)

Contact:

City Clerk: 916-808-7200

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EXHIBIT B



CITY OF SACRAMENTO AFTER ACTION REPORT

SUBJECT: City Leased Property Clean-up - Haggin Oaks Golf Complex

LOCATION: 3645 Fulton Ave (Haggin Oaks Golf Complex), open space area along
Northwest border of property

PROJECT DATES: February 21, 2023 – March 31, 2023

SUBMITTED BY: Captain Bryce Heinlein, Sacramento Police Department

PROJECT SUMMARY:

The City of Sacramento identified this location as a High Priority, Level 1 Encampment. This location is a city owned parcel that has been leased to Morton Golf. Per the Sacramento City Attorney's Office, under the current lease, the location is considered private property.

In January, 2023 the City of Sacramento begun preliminary logistical planning for a large scale cleanup effort of the Arcade Creek nature area that borders the northwest perimeter of the City of Sacramento leased property located at 3645 Fulton Avenue. This location is home to the Haggin Oaks Golf Complex, located in City Council District 2, Police District 2A.

Due to the secluded nature and proximity to available public transportation resources, this area has historically suffered from ongoing and vast amounts of unlawful camping activity, illegal dumping and criminal activity. Some of the negative effects of unlawful camping include environmental destruction, threat of fire hazard and health safety issues related to the open disposal of hazardous material, including but not limited to trash, needles, drug paraphernalia and human waste.

A site visit and evaluation was conducted by the Sacramento Police Department's Impact Team on February 16, 2023. It was clear that there was a public health and safety risk that necessitates urgent relocation of the unhoused. There was an immense amount of trash, debris, abandoned vehicles, narcotics paraphernalia and potentially hazardous materials dumped at the location. There has been a number of fires reported in the immediate area and clear evidence that recent fire activity had occurred. The property is adjacent to critical infrastructure of a Regional Transit Light Rail and nearby Interstate 80. In addition, there have

been a disproportionate number of community concerns documented through the 911, 311 systems and direct constituent complaints to the City of Sacramento.

PROJECT TIMELINE:

The Department of Community Response (DCR) began intense outreach on February 21, 2023 and continued for the duration of the operation. Their primary mission was to provide services, to include housing (if desired), to those individuals contacted on the property that were experiencing homelessness.

SPD Impact Officers began preparatory work at the project site on March 2, 2023 with a planning meeting with the leasee, Morton Golf. Additional meetings were held with a number of City and County Departments to discuss the resolution strategy and services that each department could provide during the operation. Throughout the month of March, Impact Officers posted camp sites with removal notifications and contacted people experiencing homelessness, offering support and services to those individuals.

Clean-up efforts began on April 3, 2023. SPD Impact Officers worked in conjunction with the following City of Sacramento departments; Code Enforcement, Public Works, Department of Utilities, Fire Department and the Department of Community Response. In addition, the Sacramento County Sheriff's Work Project, Morton Golf, Union Pacific Rail Road, CalTrans and Forensiclean provided support throughout the project.

Clean up occurred seven days a week from 8:00am-4:00pm and officially concluded on Friday, April 21, 2023. SPD and on-site security have continued to monitor the property to discourage individuals from trespassing on the property. This will continue until a guard rail is installed on the east side of Roseville Road by Public Works. (Anticipated timeline: 1-2 months)

METRICS: (SPD Impact, Code Enforcement, Forensiclean)

Metrics	Total
PEH Contacted	18
Arrests	1 Felony Warrant
Stolen Vehicle Recovered	11
Total Vehicles Removed from Property	24
Total Trash Removed	215,060 lbs
Metal and Propane Tanks Removed	20,000 lbs
Syringes Disposed	2,143

METRICS: (DCR Specific)

Service Type	Total
Total Contacts	245
Total Engagements	187
Coordinated Access Referrals	6
ID Voucher	18
HMIS Enrollments	21
Mental Health Assessments	5
Referred to DHA	3
Behavior Health Referral	1

***Definitions:**

1. **Contact** – “any exchange between staff and an unhoused community member.”
2. **Engagement** – “a more substantial interaction where discussion of service provision takes place.”
3. **Coordinated Access Referral** – “shelter referrals which place an individual on a list for available shelter spots.”

LONG TERM GOALS:

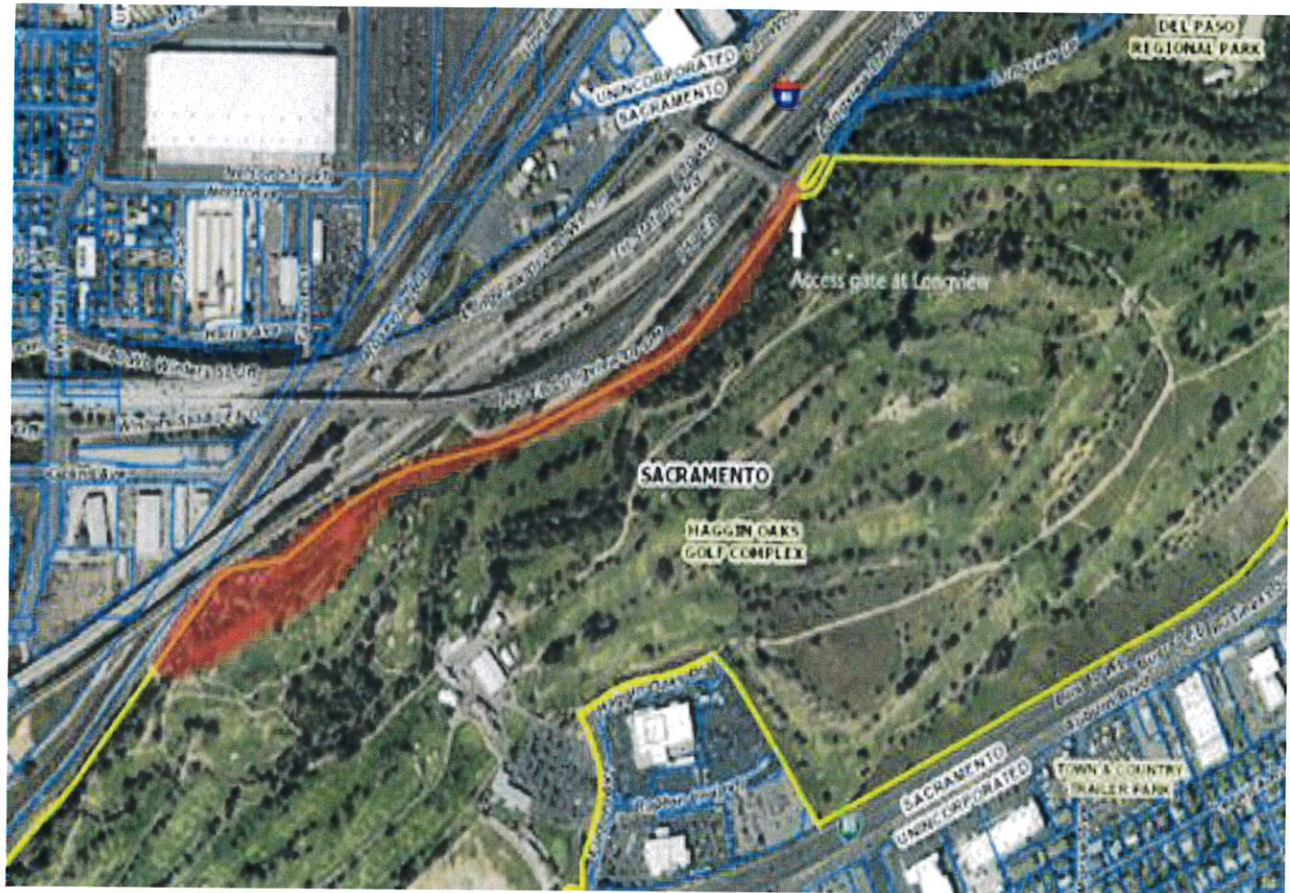
Concurrent with this clean-up, SPD consulted with Morton Golf and gave recommendations through a Crime Prevention Through Environmental Design (CPTED) model to help secure the property and prevent further trespassing and illegal dumping. Morton Golf has installed numerous “No Trespassing” signs along the west side of the property, visible from Roseville Road and throughout the property. Sign installation is on-going and will cover the full property and will be in highly visible areas in clear view of the public.

Public Works installed a heavy-duty access gate on the west side of the leased property so emergency personnel (SFD and SPD) can access the property with large equipment, if needed. This gate has secured the main entrance to the property, limiting vehicle access to the site and will predominantly serve as an emergency access point for the fire department.

Allied Security has been hired by Morton Golf to keep unauthorized individuals from entering the property, establishing camps, and/or illegal dumping. Security is currently operating during business hours, seven days a week from 7am – 7pm to assist in securing the site during the continued clean-up operation.

The City of Sacramento has consulted with Cal Trans who has agreed to clean-up their property north of the City leased property and repair fence-line breaches that separate the State-owned property from the City owned/leased property. This work has begun and will continue until completed. There is no anticipated completion date at this time.

OVERVIEW MAP OF AREA:



BEFORE/AFTER PHOTOS OF PROPERTY:

Camp 1

Before



After



Camp 2

Before



After



Camp 3

Before



After



Camp 4

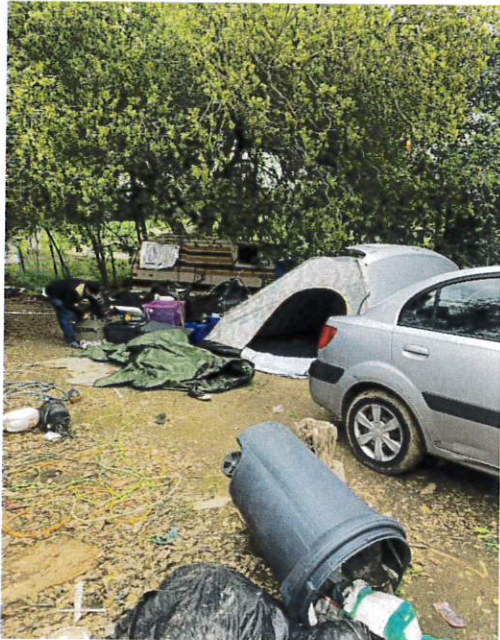
Before



After



Camp 5
Before



After



Camp 6
Before



After



Camp 7

Before



After



Camp 8

Before



After



Camp 9
Before



After



Camp 10
Before



Camp 11

Before



After



Camp 12

Before



After



Camp 13

Before



After



Camp 14

Before



After



Camp 15

Before



After



Camp 16

Before



After



Camp 17
Before



After



Camp 18
Before



After



Camp 19

Before



After



Camp 20

Before



After

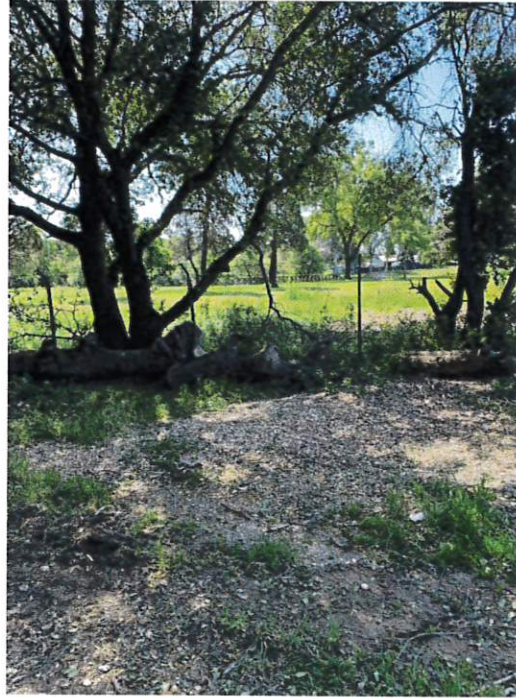


Camp 21

Before



After



Camp 22

Before



After

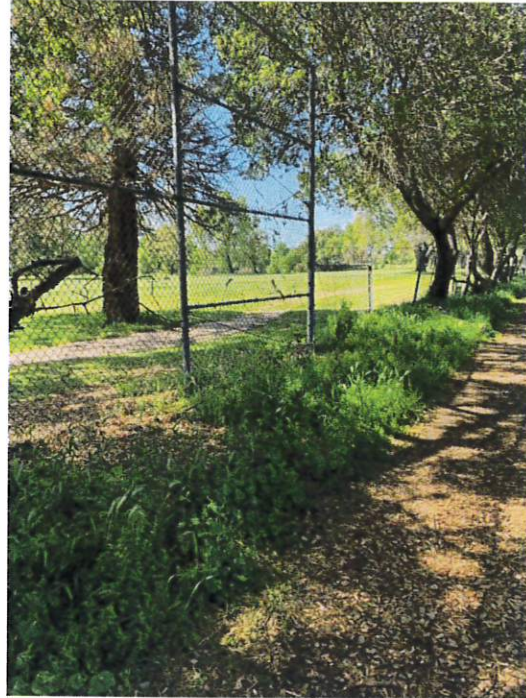


Camp 23

Before



After



Camp 24

Before



After



EXHIBIT C



CITY OF SACRAMENTO AFTER ACTION REPORT

SUBJECT: Roseville Road **Phase III** Clean Up

LOCATION: Roseville Road from Connie Drive to Arcade Creek

PROJECT DATES: June 15, 2023 – July 6, 2023

SUBMITTED BY: Sergeant Andrew Pettit, Sacramento Police Department

PROJECT SUMMARY:

Roseville Road between Connie Drive and Arcade Creek has been identified as the last phase (**Phase III**) of an ongoing effort to restore the public roadway, culvert and the nearby holding pond located inside Haggin Oaks Golf Course, which is maintained by the Department of Utilities. This area has been identified by the City of Sacramento as a Level 1 Encampment and has generated numerous complaints from the community, Morton Golf and City Departments. Additionally, there have been several fatal (vehicle vs. pedestrian) accidents, reports of assaults, as well as homicides within the immediate area. The Department of Utilities, Public Works and PG&E have postponed critical work in the location due to longterm occupation along Roseville Road and the surrounding area. Numerous openings along the southwest fence line of Haggin Oaks Golf Course have been breached where camps have been constructed on private property. This project was a seven month venture and was divided into three phases.

Phase I

In January, 2023 the City of Sacramento began planning for the clean up of the Arcade Creek nature area that borders the northeast perimeter of the City of Sacramento's leased property located at 3645 Fulton Avenue. This area is located along the north portion of Haggin Oaks Golf Complex and bordered on the north by the Roseville Road Light Rail Station.

Phase II

A site visit and evaluation was conducted by the SPD Impact Team on February 16, 2023. There were approximately 24 occupied camps located in this area, many with multiple inhabitants. The Department of Community Response (DCR) conducted intensive outreach throughout the duration of the operation. An enormous amount of trash, debris, abandoned vehicles, narcotics paraphernalia and potentially hazardous materials were observed. There were a

number of fires reported in the immediate area and clear evidence that recent fire activity had occurred. The property is adjacent to critical infrastructure of a Regional Transit Light Rail tracks and nearby Interstate 80. Cleanup efforts by multiple city departments began on April 3, 2023 and concluded April 21, 2023.

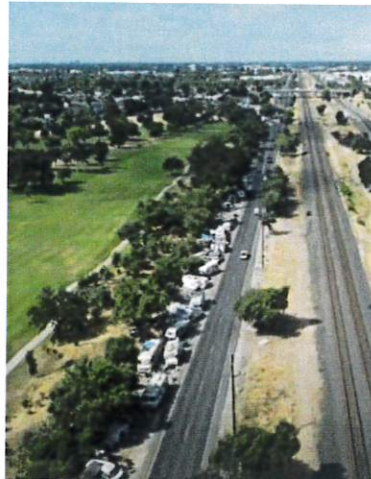
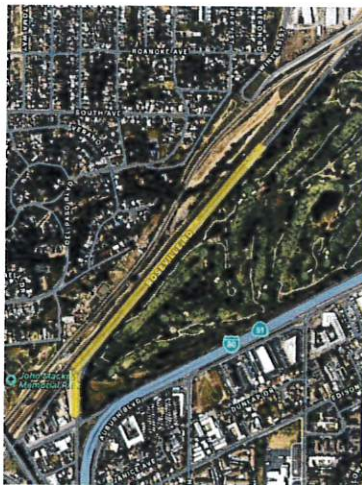
(See After Action Report: **City Leased Property Clean-up - Haggin Oaks Golf Complex** for details of Phase I & Phase II)

Phase III

The Sacramento Police Department's Impact Team began contacting and messaging occupants along Roseville Road on June 15, 2023. All individuals at that time were given verbal advisals of the multi-day cleanup, which was scheduled to begin June 28, 2023 and conclude on July 6, 2023. Below is a brief overview of the events that occurred during the operational period.

06/15/23

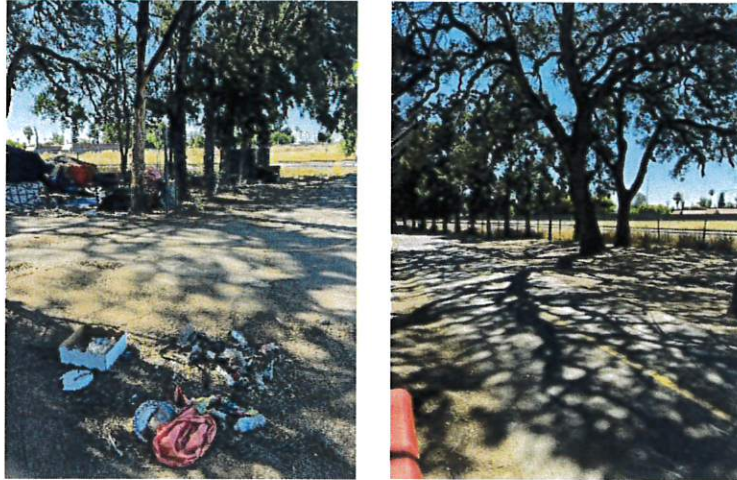
The SPD Impact Team attempted to contact all occupants along Roseville Road between Connie Drive and the Arcade Creek. Most subjects appeared to be occupying inoperable RVs and make-shift, unpermitted structures. All individuals contacted were advised the area would need to be cleared by June 28, 2023, due to vehicle compliance and road and culvert maintenance.



06/16/23

The Impact Team contacted multiple people camping inside of Haggin Oaks Golf Course just inside the cut cyclone fence line. They were advised they were trespassing on private property and were requested to relocate.

Additional subjects were found to be camping along a bike trail entrance at the southwest portion of Haggin Oaks Golf Course. Forensiclean responded and removed approximately 20 yards of garbage and abandoned debris.



6/17/23

The SPD Impact Team verbally noticed individuals remaining in the work zone area along Roseville Road and the surrounding area of the planned clean-up and maintenance work to be done.

06/19/23

The SPD Impact Team continued to advise occupants of the June 28th, 2023, cleanup. Individuals stated they planned on moving prior to that date.

Forensiclean responded and removed trash and debris from inside of the Haggin Oaks Golf Course property near Connie Drive and Roseville Road. Approximately 30 yards of debris and 27 needles were collected. The subjects who were occupying this area moved out onto Roseville Road. All individuals were advised of the planned cleanup date.



6/23/23

The Code Enforcement Vehicle Abatement Team conducted initial inspections on Roseville Road. A total of **41 vehicles** were marked for tow. A re-inspection date was set for June 28, 2023.



6/24/22

To stop vehicles from moving north on Roseville Road and repopulating the area where Phases I and II took place, the Department of Public Works installed K-railing along the North portion of Roseville Road. This was done as a deterrent so vehicles from Phase III did not relocate further up the road causing additional hazards to motorists. In addition, these precautions were taken to help stop illegal dumping in the area.

The Department of Public Works provided a detailed traffic plan for the closure of Roseville Road during the cleanup.



6/24/23 – 6/26/23

SPD Impact Team and DCR continued to advise Roseville Road occupants of the planned cleanup.

6/28/23 - Day 1 of Action

Prior to any action, SPD Impact Sergeant, Andrew Pettit held a field briefing with the involved City Departments at the Roseville Light Rail Station. The briefing covered the operational logistics of each department and responsibilities of Forensiclean. In attendance were SPD Impact Officers, SPD Traffic Control Officers, Community Service Officer, Mental Health Officers, Sacramento Sheriff Homeless Outreach Team, Sacramento County Probation, Regional Transit Officers, Code Enforcement, Department of Utilities, Department of Community Response, Public Works, Forensiclean, and several private contracted tow companies.

Roseville Road, between the Roseville Road Light Rail station and Connie Drive was closed to through traffic to ensure the safety of all individuals within the work zone. Public Works provided traffic signs and cones. Each end of the road was monitored by SPD Traffic Control Officers.

Despite continuous messaging, a large amount of people and vehicles remained on Day 1 of the operation. DCR staff contacted **24 people** and had **18 more engagements**. Seven (7) people were referred and were accepted to the Outreach and Engagement Center (OEC). Of those, four (4) were transported to the OEC and were sheltered. Three (3) more individuals were accepted to the OEC but were not ready to leave at the time of initial contact.

Code Enforcement towed **30 vehicles** of various condition. Most of the vehicles were inoperable.

Despite the remaining subjects and vehicles, everyone was compliant. The remaining individuals moved across the street near the railroad tracks of Union Pacific property.

The Department of Utilities began their scheduled maintenance along Arcade Creek under Roseville Road and inside Haggin Oaks Golf Course where a large catch basin is located on the southwest portion of the property.

Forensiclean utilized twelve (12) trucks and two (2) tractors to remove **87,000lbs of trash and debris**, and **84 needles**, and **6 truckloads of metal** that were disposed of later. Forensiclean donated additional work crews and a tractor for Day 1.

By the end of the day, the area was clear of any remaining RVs/cars but a large amount of trash and debris in the culvert along Roseville Road and inside Haggin Oaks Course along the fence line remained.

06/29/23 - Day 2

With all vehicles removed from the area and very few people left, a smaller morning briefing was given by Sgt. Pettit. In attendance were SPD Impact Officers, SPD Traffic Control Officers, Community Service Officer, Mental Health Officer, Department of Utilities, and Forensiclean supervisors.

Roseville Road was once again closed to through traffic. There were five (5) individuals rummaging through left-over debris when the Impact Team arrived. These individuals were advised of the active work zone and that all material would be removed. Everyone was compliant and left the area.

The Department of Utilities continued to work in the catch basin located inside the golf course and repaired multiple nearby fence openings.

Union Pacific Railroad Police responded due to the large number of people who had relocated near their train tracks. They educated those individuals on the legal distance they were required to keep away from the tracks.

Forensiclean made **46 dump runs** with a total of **148, 000 lbs.** of trash and debris and **116 needles** removed.

All large piles of debris and trash were removed. A significant amount of scattered trash remained against the roadway fence line and was scheduled to be disposed the following day.

06/30/23 – Day 3

SPD Impact officers met with Forensiclean's owner to discuss the final day of cleanup. Staffing included SPD Impact Officers, SPD Traffic Control Officers, a Community Service Officer, a Mental Health Officer, and two Forensiclean teams.

Once again, Roseville Road, between the Roseville Road Light Rail Station and Connie Drive was closed to through traffic by Public Works. Traffic Control Officers resumed their previous locations for added safety.

The Department of Utilities concluded their work at the catch basin and adjacent culvert.



Forensiclean utilized their two teams to hand-remove the remaining trash and debris. Total amount was **1900 lbs. and 57 needles.**

07/01/23 – Day 4

Impact officers received information from Forensiclean that multiple vehicles returned. Trash and debris were scattered throughout the area. The individuals that returned were sent on their way without incident. Forensiclean responded and removed **820 lbs. of trash.**



Phase III Summary

A total of **318,260 pounds** of debris and **257 needles** were collected. (Not including a truck load of tires that were collected from the area and staged for future removal.)

Public Works installed K-rail along the cleaned area as a deterrent from future occupation and illegal dumping.

**METRICS: (SPD Impact, Code Enforcement, Forensclean)**

Metrics	Total
PEH Contacted	18
Arrests	0
Stolen Vehicle Recovered	0
Total Vehicles Removed from Property	30
Total Trash Removed	318,260 lbs
Syringes Disposed	257

METRICS: (DCR Specific)

Service Type	Total
Total Contacts	22
Total Engagements	19
Coordinated Access Referrals	5
ID Voucher	4
HMIS Enrollments	5
Mental Health Assessments	0
Referred to DHA	7
Behavior Health Referral	0

***Definitions:**

- 1. Contact** – “any exchange between staff and an unhoused community member.”
- 2. Engagement** – “a more substantial interaction where discussion of service provision takes place.”
- 3. Coordinated Access Referral** – “shelter referrals which place an individual on a list for available shelter spots.”

LONG TERM GOALS:

The Sacramento Police Department Impact Team has made a commitment to keep Roseville Road a high priority location. This roadway is a highly trafficked roadway used by motorists for accessing the City of Sacramento. It will take continual patrolling and vigilant reporting from Morton Golf, the community, and allied Sacramento City Departments to keep this area free and clear of illegal dumping and occupation.

Morton Golf will continue to have private security patrol the interior perimeter of the golf course paralleling Roseville Road. Permanent guardrails are scheduled to be installed by Public Works, limiting vehicle access to the dirt shoulder of Roseville Road and provide safety to motorists who frequent this throughfare.

EXHIBIT D



CITY OF SACRAMENTO AFTER ACTION REPORT

SUBJECT: Coordinated Compliance Cleanup

LOCATION: 2800 C Street

PROJECT DATES: July 12, 2023 – July 21, 2023

SUBMITTED BY: Sergeant Andrew Pettit & Officer Gaeton McVane, Sacramento Police Department

PROJECT SUMMARY:

The immediate area surrounding the Military Department State of California building had been identified as a High Priority, Level 1 Encampment by the City of Sacramento. This location was heavily inhabited by both encampments and out-of-compliance vehicles. Since early 2023, countless calls of criminal activity have been reported from nearby residents and community members; specifically narcotic activity, prostitution, theft, assaults and vandalism.

TIMELINE:

July 12, 2023

The Department of Community Response (DCR) and the Sacramento Police Department conducted a joint outreach operation to seek camp-compliance and to offer safe alternative shelter to those within the area of 2800 C Street.

There were 38 encampments and 31 people who were identified upon initial contact. All subjects were advised of various camp violations and that cleanup would occur on July 19, 2023. DCR conducted concurrent outreach. Messaging was conducted throughout the project.

July 19, 2023

Day 1

Upon arrival, 20 people from the 38 encampments were still present. Those who remained were still in violation of several Sacramento City Code sections related to camping. Multiple

media outlets were on scene along with several homeless advocates. As the day progressed, compliance was met with only a handful of subjects remaining. Approximately five individuals carried their items across the street to Leland Stanford Park. We received multiple calls from people who were concerned about the use of the park due to scheduled children's soccer practice. City Park Rangers assisted in attempt to get subjects in compliance.

DCR obtained commitments from **16 subjects** who advised they were willing to accept services at Miller Park Safeground.

Forensiclean utilized 7 trucks and 1 tractor-claw to remove **10,040 pounds** of trash and debris on Day 1. They collected and disposed of **783 syringes** and power washed the surrounding sidewalk.

July 20, 2023

Day 2

The Impact Team and DCR returned to the area and spoke to the remaining subjects in the area. Services were once again offered. DCR spoke to **5 subjects** who were interested in Miller Park Safeground. Those who were not interested continued to pack their items and found friends and family to assist them out of the area.

Left over debris was collected by Forensiclean. They utilized 5 trucks and a tractor-claw to remove approximately **2,360 pounds** of trash and debris from Leland Standford Park. They also collected **30 syringes** from the immediate area.

July 21, 2023

Day 3

A final survey of the area was conducted by both DCR and Impact. Approximately three subjects continued to linger along the southwest corner of 28th and C St, in violation of excessive storage and sidewalk obstruction. Impact was able to gain voluntary compliance and an alternate location was sought.

SUMMARY:

The City of Sacramento used a coordinated collaboration as well as support from our City leaders to return this area to its original functioning state. There were no citations or arrests issued during this operation.

In total, **11 out of 38** subjects were placed at Miller Park Safeground. **12,400 pounds** of trash and debris was collected, with **813 needles** were safely disposed of.

METRICS: (SPD Impact, Forensiclean, DCR)

Metrics	Total
Camps Contacted	38
Arrests	0
Stolen Vehicle Recovered	0
Total Vehicles Removed from Property	0
Total Trash Removed	12,400lbs
Syringes Disposed	813

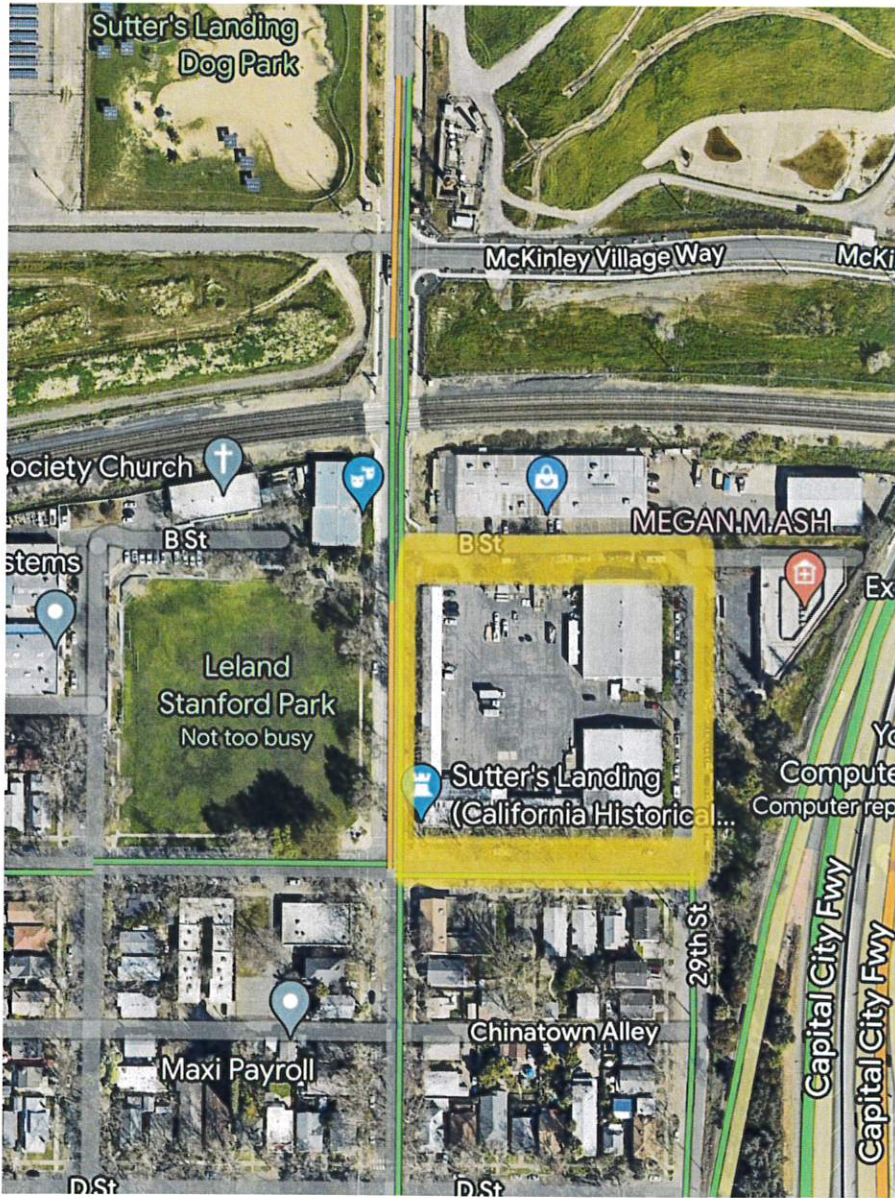
METRICS: (DCR Specific)

Service Type	Total
Total into Miller Safe Ground	11
Total Engagements	25
Coordinated Access Referrals	15
ID Voucher	7
Mental Health Assessments	0
Referred to DHA	0
Behavior Health Referral	0

***Definitions:**

- 1. Engagement** – “a more substantial interaction where discussion of service provision takes place.”
- 2. Coordinated Access Referral** – “shelter referrals which place an individual on a list for available shelter spots.”

Area Map:



Before



Eastbound C Street

After



Eastbound C Street



Northbound 28th Street



Northbound 28th Street

Before



Eastbound C Street

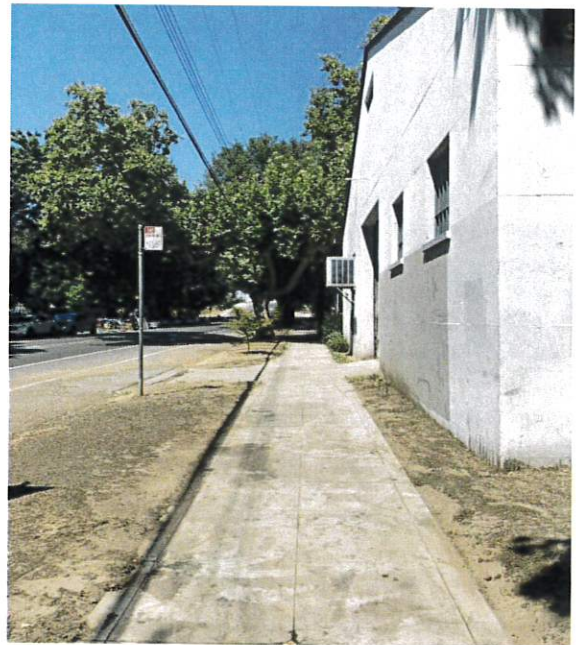
After



Eastbound C Street



Northbound 28th Street



Northbound 28th Street

Before



Southbound 29th Street

After



Southbound 29th Street



Southbound 29th Street



Southbound 29th Street

Before



Southbound 29th Street

After



Southbound 29th Street



Leland Stanford Park



Leland Stanford Park